

United States District Court, District of Nevada

Case No. 3:12-cv-00325-RCJ-VPC, MDL No. 2357

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

In re: Zappos.com, Inc. Customer Data Security Breach Litigation

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**Objection to Proposed Settlement**

October 20, 2019

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I object to the proposed settlement. The settlement, consisting of a 10% discount on a *future* purchase, is no settlement at all. It is an offer of a discount for a future purchase that will benefit and enrich Zappos because it requires a profitable new sale to be agreed to, which is similar to other coupon-discount sales regularly promoted by this company. The proposed settlement is not fair, reasonable or adequate. A settlement should compensate and benefit the Class without requiring any of them to spend additional money or to transact business again with the Defendant, whose alleged practices exposed their data to a breach.

Class Counsel have asked for \$1,620,000 in total fees and costs. I respectfully suggest they instead be awarded a 10% discount at Zappos, given the nature of the settlement they have proposed for the Class.

Here is information requested:

(1) my full name and postal address, and, if represented by counsel, the name, bar number, address and telephone number of my attorney:

**Brendan Schulman, 168 Western Drive, Short Hills, NJ 07078**

**I am not represented by counsel.**

(2) a statement that you are a Settlement Class Member;

**I am a Settlement Class Member.**

(3) documents establishing, or information sufficient to allow the Parties to confirm, that you are a Settlement Class Member;

**I enclose a copy of an August, 15, 2006 purchase from Zappos. I have been receiving emails from Zappos ever since that date.**

(4) a statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel;

**I am unable to attend the Final Approval Hearing in person or through counsel.**

(5) a statement of your specific objections and the grounds supporting the objections;

**See above.**

(6) identification and production of copies of any documents that you desire the Court to consider;

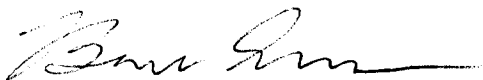
**See above.**

and (7) your original signature (for individuals) or the original signature of a legally-authorized representative (for entities).

**Provided below.**

I am mailing copies of this objection to Class Counsel and Counsel for Zappos at the addresses indicated in the Notice.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Brendan Schulman", with a long horizontal flourish extending to the right.

Brendan Schulman

October 20, 2019



Brendan Schulman &lt;bmschulman@gmail.com&gt;

**Thank you for your order with Zappos.com!**

1 message

**Zappos.com** <customerservice@zappos.com>  
To: bmschulman@gmail.com

Tue, Aug 15, 2006 at 5:16 PM

Order #: 50215005  
Items ordered: 1  
Total: \$93.95  
Date: 2006-08-15 14:16:17 Pacific Time

Brand, Style, Color, Size and Width	Price
Kenneth Cole Reaction T-Flex Black Leather Size 10 Width D - Medium	\$ 93.95
Item subtotal:	\$ 93.95
Shipping:	\$ 0.00
Total:	\$ 93.95

Ship To:  
Brendan Schulman  
127 W. 96th St. Apt. 15F  
New York, NY 10025

Bill To:  
Brendan Schulman  
127 W. 96th St. Apt. 15F  
New York, NY 10025  
MasterCard \*\*\*\*\*6728  
Exp. 10/2008

Thank you for shopping with Zappos.com!  
Because you ordered free standard shipping, you should receive your products within 4-5 business days (please allow additional time if shipping to an APO/FPO military address). Business days are Mondays through Fridays, except for holidays.

Please note that due to credit card company approval procedures, there could be a delay if billing information is inaccurate, or if billing and shipping addresses are different.

All of our products come with a 365-day money back guarantee. If you are not 100% satisfied, you can return them for a full refund. We'll even provide you with a pre-paid UPS return label, so you won't have to pay for the return shipping! We just ask that the products are in the condition you received them and in the original box. Please see our web site for full details about our return policy.

We are constantly striving to provide our customers with the best possible service. We hope that your shopping experience has been an enjoyable one! If there is anything we can do to improve your experience please let us

know. We can be reached by email or by phone:

E-mail: [cs@zappos.com](mailto:cs@zappos.com)

Phone: Toll-free 1-800-ZAPPOS-1 (1-800-927-7671) or  
702-943-7677

If you have any general questions you need an immediate answer to,  
please visit the Customer Service section of our Web Site at:

<http://www.zappos.com/cs.zhtml>

Thanks again for shopping with Zappos.com. We look forward to serving  
you again in the future!

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Customer Loyalty Team  
Zappos.com - The Web's Most Popular Shoe Store!  
<http://www.zappos.com>

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CLERK'S OFFICE

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